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Attorneys for Plaintiffs Philip and Karen Wingen

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

PHILIP WINGEN and KAREN WINGEN,  
husband and wife, and the marital community  
comprised thereof;  
Plaintiffs,

vs.

VENTRUM ENERGY CORP., a Nevada  
corporation; SALT CREEK WEST DRILLING  
FUND, LLP, a Nevada limited liability  
partnership; VENTRUM LOUISIANA, LLP, a  
Nevada limited liability partnership; MACKEL  
AMERICA CORP, a Nevada corporation; NV

) **Case No.: 2:15-CV-02043-JCM-VCF**  
) **Hon. James C. Mahan**  
)  
) **STIPULATION AND ORDER TO**  
) **EXTEND TIME TO RESPOND TO**  
) **COMPLAINT**

AMERICA CORP., a Nevada corporation;  
 ANDREWW T. VAN SLEE a/k/a ANDREW  
 SLEE, and JANE DOE VAN SLEE, a married  
 couple, and the marital community comprised  
 thereof; CATHERINE ELKINS and JOHN DOE  
 ELKINS, a married couple, and the marital  
 community comprised thereof; MARY HILL  
 and JOHN DOE HILL, a married couple, and  
 the marital community comprised thereof;  
 FOSSIL ENERGY, INC., a Delaware  
 corporation; WEST SALT CREEK, INC., a  
 Wyoming corporation; MONTGOMERY  
 GEORGE; PAUL GRADY and JANE DOE  
 GRADY, a married couple, and the marital  
 community comprised thereof; WILLIAM  
 STURDEVANT; TARI VICKERY; SAMCO  
 OIL, LLC, a Delaware limited liability company;  
 BKV VENTURES, LLC, a Louisiana limited  
 liability company; AVIHAIL KOCHLANI and  
 JANE DOE KOCHLANI, a married couple, and  
 marital community comprised thereof;  
 CGROWTH CAPITAL, INC., a Delaware  
 corporation; WILLIAM M. WRIGHT, III and  
 JANE DOE WRIGHT, a married couple, and the  
 marital community comprised thereof;  
 KEYSTONE FINANCIAL MANAGEMENT,  
 INC., a Washington corporation and JOHN DOES  
 THROUGH 50 INCLUSIVE;  
 Defendants

**STIPULATION AND ORDER TO EXTEND TIME TO RESPOND TO COMPLAINT**  
**(First Request)**

WHEREAS, Defendants CGrowth Capital, Inc., William M. Wright, III and Keystone  
 Financial Management, Inc. (collectively referred to herein as the “CGrowth Defendants”) were  
 served with the Summons and Complaint in this action on November 13, 2015;

WHEREAS, the deadline for the CGrowth Defendants to respond to the Complaint is  
 December 3, 2015; and

WHEREAS, the CGrowth Defendants retained Nevada counsel to represent them on

December 2, 2015 and said counsel requires time to review the Complaint and prepare an Answer or other response thereto;

IT IS HEREBY STIPULATED by and between the Parties, through their undersigned counsel of record, and subject to the Court's approval, that:

1. The CGrowth Defendants shall be given an additional 21 days to answer or otherwise respond to the Complaint; the CGrowth Defendants will file an answer or other response to the Complaint on or before December 24, 2015.

DATED: December 2, 2015


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William M. Wright, III and Keystone Financial  
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DATED: December 2, 2015

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Attorneys for Plaintiffs Phillip and Karen  
Wingen

**IT IS SO ORDERED:**

Date: December 3, 2015



Cam Ferenbach, U.S. Magistrate Judge